

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

ZHI TIANG LANG

Defendant

Criminal Case No. PJM 19-0433

DEFENDANT'S PERMISSION TO AMEND PRETRIAL CONDITIONS

COMES NOW, the Defendant, ZHI TIANG LANG, by and through Counsel, Barry H. Helfand, Esquire and Paul F. Kemp, Esquire, respectfully requesting that this Honorable Court Amend the Defendant's bond to permit him to live in his dorm room during the school semester and as reasons therefore states as follows:

1. On or about September 25, 2019 the Defendant was placed on U.S. Pre-Trial Services, with the condition that he is in the custody of his father, Zhi Lang, at an address approved by Pre-Trial Services.

2. The Defendant has been in compliance with Pre-Trial services since September 25, 2019.

3. The Defendant's mother, Tia Li, is a Florida resident, who is scheduled to visit her son for the holidays on or about December 23, 2019 through January 2, 2020. Ms. Li would like to spend the Holiday's with her son residing at a Hotel with an address approved by Pre-Trial Services.

4. Ms. Li, will agree to supervise the Defendant in accordance with all the conditions of his release, and to use every effort to assure the Defendant's appearance at all scheduled court proceedings, and to notify the Court immediately if the Defendant violates any condition of release or disappears.

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5. The next scheduled Court date is January 8, 2020 for sentencing.

WHEREFORE, it is respectfully requested that this Honorable Court issue an order granting Mr. Lang permission to reside with his mother during December 23, 2019 through January 2, 2020 at a Hotel with an address approved by Pre-Trial Services and further relief as this Court deems just, equitable, and appropriate.

Respectfully submitted,

DATE: December 9, 2019

BARRY H. HELFAND, P.A.

____/s/_Barry H. Helfand____

Barry H. Helfand, Esq.
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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on this **9th** day of **December 2019**, a copy of the Defendant's Request was caused to be served by filing that document with the Clerk of the Court under the Court's CM/CEF system, which electronically transmits a copy to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be mailed by first class mail, postage pre-paid, to those identified as non-registered participants.

____/s/_Barry H. Helfand____

Barry H. Helfand, Esq.

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ORDER

UPON CONSIDERATION of the foregoing Defendant's Permission to Amend Pretrial Conditions filed herein by the Defendant, it is this _____ day of December 2019, by the United State's District Court for the District of Maryland, hereby,

ORDERED that the Defendant may reside with his mother during December 23, 2019 through January 2, 2020 at a Hotel with an address approved by Pre-Trial Services.

Peter J. Messitte
Senior United States District Judge

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